

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

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UNITED STATES OF AMERICA,	)	
	)	
v.	)	Case No. 1:10cr45
	)	The Hon. Liam O'Grady
WILLIAM RONDELL COLLINS,	)	Sentencing Date: 7/16/10 @ 9:00 a.m.
	)	
Defendant.	)	
	)	

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**DEFENDANT'S NON-CONFIDENTIAL MEMORANDUM IN SUPPORT OF MOTION  
TO SEAL**

COMES NOW, the Defendant, William Rondell Collins, by and through counsel, and pursuant to Local Rule 49(E), and in support of his Motion to Seal Exhibits B, C and D to his Position on Sentencing, Defendant hereby states as follows:

The Court has power over its own records and may seal any documents for which the public's right of access is outweighed by competing interests. *See In Re Knight Pub. Co.*, 743 F.2d 231, 235 (4<sup>th</sup> Cir. 1984). In this case, the risk of revealing identifying information of a cooperating informant as well as the manner/method/means of investigation, outweighs the public's right of access to these exhibits.

This very information has already been provided protection by a previous order sealing other documents in this case, and so sealing these exhibits maintains the protection already approved and ordered.

WHEREFORE, Defendant respectfully prays that this Court seal Exhibits B, C and D to his Position on Sentencing, to be submitted thusly on July 12, 2010.

Respectfully Submitted,

WILLIAM RONDELL COLLINS  
By Counsel

RICH ROSENTHAL BRINCFIELD MANITTA DZUBIN & KROEGER, LLP

By: \_\_\_\_\_ /s/ \_\_\_\_\_.

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Counsel for Defendant William Rondell Collins

**CERTIFICATE OF ELECTRONIC SERVICE**

I HEREBY CERTIFY THAT on July 11, 2010 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notice of such filing to the following registered CM/ECF users:

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/s/  
Lana Manitta